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UNITED STATES DISTRICT COURT  
IN AND FOR NORTHERN DISTRICT OF CALIFORNIA

CAMERON DYESS, an individual,

Plaintiff,

vs.

ESTATE OF JAJUAN LEE MORTON.  
Deceased; DONYELL SHAJUAN  
HANKINS as Personal Representative of the  
ESTATE OF JAJUAN LEE MORTON,  
Deceased; PA SOLUTIONS, INC., a  
Michigan Corporation: and DOES 1 through  
20, inclusive,

Defendants.

**Case No. 4:20-cv-0909-HSG**

*The Honorable Haywood S. Gilliam, Jr.,  
Courtroom 2*

**DEFENDANT PA SOLUTIONS, INC.'S  
SUBMISSION OF PROPOSED  
JUDGMENT FOLLOWING ORDER  
GRANTING MOTION FOR SUMMARY  
JUDGMENT**

Action Filed: 02/06/2020  
Trial Date: 11/08/2021

Defendant PA Solutions, Inc. ("PA Solutions") hereby submits for the Court's entry the  
attached proposed judgment following the granting of PA Solutions' Motion for Summary  
Judgment on August 13 2021 (Dkt. no. 62.)

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DATED: August 16, 2021

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Andrew C. Hubert  
Dana Alden Fox  
Andrew C. Hubert  
Attorneys for Defendant, PA Solutions, Inc.

**FEDERAL COURT PROOF OF SERVICE**

Dyess v. PA Solutions, Inc.  
Case No. 4:20-cv-00909-HSG

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On August 16, 2021, I served the following document(s): DEFENDANT PA SOLUTIONS, INC.'S SUBMISSION OF PROPOSED JUDGMENT FOLLOWING ORDER GRANTING MOTION FOR SUMMARY JUDGMENT

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

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1 The documents were served by the following means:

2  
3 ☒ (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically  
4 filed the documents with the Clerk of the Court using the CM/ECF system,  
which sent notification of that filing to the persons listed above.

5 I declare under penalty of perjury under the laws of the United States of  
6 America and the State of California that the foregoing is true and correct.

7 Executed on August 16, 2021, at Los Angeles, California.

8 *Tania Moore*

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Tania Moore